

# **EXHIBIT T**

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King Exhibit 1

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**2022:**

Who: Guillaume Lample (left company in 2023)  
When: Download took place beginning ~10/22  
What: Data from LibGen Fiction, LibGen Scitech  
(File lists produced at Meta\_Kadrey\_00237775, sample of file  
lists provided under binder Tab 5A)  
How: Torrent download; believed to have used a version of the  
download.py script (produced at Meta\_Kadrey\_00238129 and  
provided under Tab 8), downloaded to Meta H2 cluster  
Records: Torrent log files created by a version of the download.py script  
(log files produced at Meta\_Kadrey\_00238128, sample  
provided under Tabs 6A, 6B)

**2023:**

Who: Nikolay Bashlykov  
When: Beginning in ~Spring 2023  
What: Data from LibGen SciMag. Other portions direct downloaded.  
How: Torrent download, to Meta Devserver  
Records: No logs or other information located

**2024:**

Who: Xiaolan Wang (downloaded), David Esiobu (set up AWS  
instances and downloaded .torrent files for Ms. Wang)  
When: ~April-June 2024 (data from Anna's Archive, i.e., data from IA,  
Z/Lib, and portions of LibGen Scitech (non-fiction)),  
~September-October 2024 (data from DuXiu)  
What: Data from Internet Archive (IA) Digital Lending Library,  
Z/Library, portions from LibGen Scitech (nonfic), DuXiu  
How: Torrent download, used AWS EC2 instances, identified at  
Meta\_Kadrey\_00237286 under Tabs 9  
Upload?: AWS cost and usage for AWS instances  
Meta\_Kadrey\_00237299 at Tab 1A (Cost and usage for April-  
July 2024, not de-duplicated, obtained from query to internal  
DB)  
Meta\_Kadrey\_00237297 at Tab 2A (Cost and usage for  
August-October 2024, not de-duplicated, obtained from query  
to internal DB)

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Meta\_Kadrey\_00238140 at Tab 3A (Cost and usage for April-  
 July 2024, de-duplicated, obtained from queries to AWS)  
 Meta\_Kadrey\_00238141 at Tab 4A (Cost and usage for  
 August-October 2024, de-duplicated, obtained from queries to  
 AWS)

**Interviews:**

Tim Eberhard – existence of logs: (1) forward proxy (2) devserver shell  
 history; 1 year in hive for each

David Esiobu – AWS setup for Xiaolan; directory structure with .torrent files

Xavier Martinet – colleague of Mr. Lample, attempted to facilitate contact

Nikki Vo – Attempted to contact Mr. Lample; no response

Xiaolan Wang – torrent downloads; examined samples of torrent  
 downloads; decompressed, scp'd to laptop; no more than 100 files, avg  
 size 120MB